

January 8, 2007

From: Willie Moorhead  
Moorhead Corral and Dirt  
1803 W. Linda Vista  
Porterville, CA 93257

To: Polly Lowry  
Central Valley Regional Water Quality Control Board  
110 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

Dear Ms. Lowry,

I am sending this letter as a written comment regarding the Tentative Waste Discharge Requirements General Order for Existing Milk Cow Dairies.

It is my understanding that the CVRWQCB is thinking about new regulations for existing dairies that would be very expensive for the dairymen and may provide very little, if any, benefit for water quality. I would like to address the proposal of requiring dairies to install test wells.

I have been in the dirt excavation business for over 30 years. Over these years I have excavated dirt from the bottoms of at least 30 waste water lagoons that have been drained so they can be modified. After peeling off about 1 foot of dirt, I reach clean soil. Not only does the dirt look clean, it doesn't have any odor. It doesn't seem to matter what kind of soils were at the bottom of the pond, or how long the pond had been there. This has been my experience time after time. My theory is that the organic particles in the manure seal off the bottom of the pond so that waste water can't get out. If waste water doesn't leak out of the waste water pond, what is the purpose of a test well?

If you would like to talk to me personally about my experiences in excavating the bottoms of existing waste water ponds you can reach me at 559-333-7696.

Thank you for your consideration.

Sincerely,

Willie Moorhead  
Moorhead Corral and Dirt

*Willie Moorhead*